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April 8, 2013

Ms. Rosa Lewis
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00523621
RE: Pre-General Report (10/1/2012-10/17/2012)

Dear Ms. Lewis:

This letter is in response to the Commission's request for additional information related to unitemized contributions on Line 11(a)(ii) on the Detailed Summary Page, the disbursement purposes used on Schedule B supporting Line 21(b) and independent expenditures that were disclosed on 48-Hour Notices but not on Schedule E of the above referenced report filed by the Service Employees International Union PEA-Federal committee.

The Commission has inquired about \$5,800,062.05 disclosed as unitemized receipts from individuals/persons other than political committees during the reporting period. As an independent expenditure only committee, Service Employees International Union PEA-Federal is permitted to fund its activity using membership dues. The \$5,800,062.05 in receipts represents the dues received from many members of Service Employees International Union that do not individually reach the \$200 itemization threshold required for disclosure of individual contributions.

In addition, the Commission has asked the committee to clarify the description "'Voter Outreach Activities (Non-Express Advocacy)'" for disbursements disclosed on Schedule B supporting Line 21(b). The committee has filed an amendment to the Pre-General Report to provide a fuller disbursement description for these transactions.

Finally, the Commission has noted that 48-Hour Notices were filed to disclose independent expenditures supporting Shelley Berkley, Barack Obama, Paul Odell Hirschbiel and opposing Daniel Lungren that were not disclosed on Schedule E supporting Line 24 of the Pre-General Report. The independent expenditure made on behalf of Paul Odell Hirschbiel was in fact disclosed on this report. You can view it on page 33 (Image # 12961200256). Additionally, the independent expenditures opposing Daniel Lungren were also disclosed on this report. You can view them on page 46 (Image # 12961200269) and page 48 (Image # 12961200271).

On the other hand, the voter canvass literature supporting Barack Obama and Shelley Berkley while it was estimated that it would be paid out of independent expenditure PAC, was ultimately paid for out of the committee's affiliated federal PAC, Service Employees International Union Committee on Political Education (C00004036). Thus the relevant expenditures associated with these two 48-Hour notices appear on that PAC's reports. You can view the payment of these independent expenditures on SEIU COPE's Post-General Report (Images # 13960680812 and 13960680813).

If you have any further questions regarding this matter, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Counsel for SEIU COPE
cc: Eliseo Medina, Treasurer, SEIU COPE
